



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

BMCSP 13.1
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444 Hospital Way #300 • Pocatello, Idaho 83201 • (208) 236-6160

Dirk Kempthorne, Governor
C. Stephen Allred, Director

September 20, 2002

Ms. Linda Meyer
U.S. EPA Region X
1200 6th Ave
M.S. WCN-121
Seattle, Washington 98101

Re: IDEQ Comments on, Pre-Final Remedial Design Report and Draft Remedial Action Work Plan, Dewatering Pit Solids Removal, Simplot Plant Area, Eastern Michaud Flats Superfund Site, August 1, 2002

Dear Ms. Meyer:

The Idaho Department of Environmental Quality (IDEQ) has reviewed the above referenced document. The IDEQ is in general agreement with this proposed work plan for the excavation and removal of phosphate ore residuals and solids precipitated by pH adjustment of irrigation waters.

To demonstrate compliance with the performance standard for this remedial action Simplot intends to take confirmation soil samples following the removal of the residual soils. Zinc has been selected as a suitable indicator parameter to confirm removal of the residual solids. The performance standard to determine cleanup was set at 360 mg/ Kg; approximately ten percent of the zinc concentration observed in the residual soil.

The IDEQ would request that all the listed constituents of concern be analyzed for in the confirmation samples and the performance standard for remediation be set at background or less than background for all constituents. This would allow for a comparison of each constituents concentration at depth and a more defensible and reasonable guideline for remedial effectiveness. In addition, selenium is absent as a constituent of concern. IDEQ would like confirmation that its absence is the result of soil samples taken from this area show selenium concentrations being below background concentrations.

Very truly yours,

C. Stephen Allred, Director

CC: [illegible]



Once the solids are removed from the Dewatering Pit, they will then be transported to Simplot's lower gypsum stack. As the gypsum stack grows the Dewatering Pit solids will be covered by gypsum. It is evident that the excess phosphate ore would be Bevil exempt wastes. The gypsum stack is Bevil exempt as well. The IDEQ, however is concerned that the solids precipitated by pH adjustments are not Bevil exempt wastes and could therefore jeopardize the Bevil exemption of the gypsum stack.

If you have any questions or concerns please call me at (208) 236-6160.

Sincerely,

A handwritten signature in black ink, reading "Douglas M. Tanner". The signature is fluid and cursive, with the first name "Douglas" being the most prominent part.

Douglas M. Tanner
Regional Environmental Manager

C: Mark Dietrich, DEQ-Pocatello
Dean Nygard, DEQ-Boise
Roger Turner, Shoshone-Bannock Tribes
Ward Wolleson, Simplot